

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

US Government
LaShawn Young

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

V.

CSL Plasma; Paul Perreault; Daniel Tasiemski
Metlife; Ogletree Deakins;
Michael Tricarico; Traveler's Insurance

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case: 2:20-cv-10738

Judge: Borman, Paul D.

MJ: Stafford, Elizabeth A.

Filed: 03-19-2020 At 04:00 PM

CMP YOUNG V CSL PLASMA ET AL (SS)

Jury Trial: Yes No
(check one)

Complaint for a Civil Case

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	LaShawn Young <i>(Relation)</i>
Street Address	20687 Kensington Court Apt 206
City and County	Southfield - Oakland County
State and Zip Code	Michigan 48076
Telephone Number	248-266-1310
E-mail Address	lashawnyoung@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	CSL Plasma, Paul Perreault, Daniel Tasiemski
Job or Title (if known)	Paul Perreault (CEO) & D. Tasiemski (Manager)
Street Address	900 Broken Sound Pkwy NW #400
City and County	Boca Raton - Palm Beach County
State and Zip Code	Florida 33487
Telephone Number	561-981-3700
E-mail Address (if known)	paul.perreault@cslbehring.com

Defendant No. 2

Name	Metlife
Job or Title (if known)	
Street Address	200 Park Ave
City and County	New York City - New York County
State and Zip Code	New York 10017
Telephone Number	(800) 638-5433
E-mail Address (if known)	

Defendant No. 3

Name	<u>Ogletree Deakins Law Firm; Michael Tricarico</u>
Job or Title (if known)	<u>Attorney Michael Tricarico</u>
Street Address	<u>9130 S Dadeland Boulevard Suite 1625</u>
City and County	<u>Miami - Dade County</u>
State and Zip Code	<u>Florida 33156</u>
Telephone Number	<u>305-374-0506</u>
E-mail Address (if known)	<u>michael.tricarico@ogletree.com</u>

Defendant No. 4

Name	<u>Traveler's Insurance</u>
Job or Title (if known)	<u></u>
Street Address	<u>485 Lexington Ave</u>
City and County	<u>New York City - New York County</u>
State and Zip Code	<u>New York 10017</u>
Telephone Number	<u>(917) 778-6000</u>
E-mail Address (if known)	<u></u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

31 USC 3729 et seq - False Claims Act & Qui Tam
 18 U.S. Code §1964 - Civil RICO Remedies
 42 U.S.C. § 12101 et seq - Americans With Disabilities Act
 18 U.S. Code §1341 - Frauds and Swindles
 MCL 600, 5813 - Fraud

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) United States (Relator LaShawn Young),
 is a citizen of the State of (name) Michigan.

b. If the plaintiff is a corporation

The plaintiff, (name) NA,
 is incorporated under the laws of the State of (name)
NA, and has its principal place of business in the
 State of (name) NA.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s) - *see Additional Information section for the rest of defendants*

a. If the defendant is an individual

The defendant, (name) CSL Plasma, is a citizen of the
 State of (name) Florida. Or is a citizen of (foreign
 nation) NA.

b. If the defendant is a corporation

The defendant, (name) CSL Plasma, is incorporated
 under the laws of the State of (name) Florida, and
 has its principal place of business in the State of (name)
Florida. Or is incorporated under the laws of
 (foreign nation) NA, and has its principal place
 of business in (name) NA.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain): *Numerous current & former CSL employees were victimized by CSL & it's agents. As such, damages exceed \$75,000.*

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Please see the Statement of Claim enclosure.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Relief statement included in "Statement of Claims" enclosure.

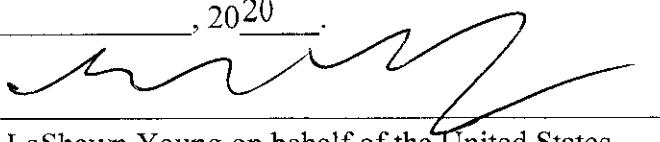
V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 19, 2020.



Signature of Plaintiff

Printed Name of Plaintiff

LaShawn Young on behalf of the United States

Additional Information:

See enclosed Statement of Claim, Relief Sought, Additional Info etc.

Defendants

Paul Perreault, Daniel Tsienski & Michael Triarico are Individuals & Citizens of the state of Florida (for purposes of this case).

Ogletree Deakins is incorporated under the laws of the State of Florida, and has its principal place of business in the state of Florida.

MetLife & Traveler's Insurance are Incorporated under the laws of the State of New York and have their principal place of business in the State of New York.

3/19/2020

- I. Statement of Claim
- II. Relief Sought
- III. Additional Information and Supporting Documents

RE: United States (via Relator LaShawn Young - LY) vs CSL Plasma, Metlife et al

I. Statement of Claim

CSL Plasma, Metlife, Traveler's Insurance, et al, are engaging in a Fraud and Corruption Scheme to wrongfully terminate employees, wrongfully deny disability claims and workman's comp claims, wrongfully deny unemployment benefits etc.

As such, CSL requires it's employees to contact managers while employees are on medical leave(s) of absence. However, CSL's managers keep **NO** records of said mandatory communications, which CSL then uses to wrongfully terminate employees, by claiming employees failed to contact managers (**per item #1 below -- LY previously sued CSL via Federal Case #2:15-cv-10080**).

Accordingly, in the case of Relator LY, CSL Manager Daniel Tasiemski (DT), blatantly committed **Felony Perjury** during Michigan Unemployment Hearings on **6/11/2014** and **7/23/2014**, per DT's sworn testimony that LY failed to contact DT on **2/12/2014** and **3/19/2014** (**per the enclosed CSL letters requiring LY to contact DT on said dates...Naturally, LY called and emailed DT and CSL on all dates in question**)

Also, DT and CSL (**aided and abetted by Ogletree Deakins Attorney, Michael Tricarico**) omitted and concealed the fact that on **3/19/2014**, DT was **OUT OF THE OFFICE AND UNAVAILABLE** (**per an auto-reply from DT's CSL email account**), while being investigated for Perjury by Michigan State Police Detective, Larissa Lamay on approx **1/29/2015**.

Additionally, Metlife (**CSL's disability contractor**) systematically and wrongfully denies claimants due process in violation of ERISA Sections **404(a)(1)** and **29 USC 1104 (a)(1)(a)**, which state that a fiduciary shall discharge his or her duties with respect to a plan, **SOLELY** in the interest of the participants and beneficiaries and for the exclusive purpose of providing benefits to participants and their beneficiaries (**LY previously sued Metlife via Federal Case #2:15-cv-11028**)

As such, Metlife previously settled for approx **\$500-Million Dollars** for wrongfully denying life-insurance claims, per the **Death Master File Lawsuit (article is enclosed per item #6 below)**.

Accordingly, in the case of Relator LY, Metlife wrongly and maliciously denied LY's claim for Short-Term Disability Benefits on **3/19/2014**, after Metlife gave LY **less than two-weeks** to obtain a new-patient appointment with a psychiatrist, when said appointments **typically take three-months or longer to obtain** (per item #5 below).

Subsequently, Metlife maliciously contacted psychiatrist, Varsha Karamchandani (VK), on multiple occasions, despite LY's explicit instructions that VK **NOT** be contacted, due to VK's negligence and malpractice against LY, during an office consultation on **3/6/2014 (VK denies said office consultation, hence LY's discovery requests for VK's and LY's GPS records and other records, per Federal lawsuit 2:15-cv-10080)**

Consequently (**in response to Metlife's malicious and bad faith inquiries**), VK falsely denied having an office consultation with LY on **3/6/2014**, which Metlife used to justify its wrongful denial of LY's initial claim and appeal for Short Term Disability Benefits.

As of March 2020, Traveler's Insurance (**CSL's Workman's Comp Insurer**), attempted to obtain a biased medical evaluation (**in favor of CSL and Traveler's**), by scheduling LY for an appointment with Dr Harvey Ager, whose extensively negative online reviews (**posted by patients he evaluated**) indicate that he is extremely anti-patient and anti-claimant (**CSL and Traveler's use biased physicians like Ager, to assist in wrongfully denying claims, justify wrongful termination etc - See enclosures, per item #7 below**)

Accordingly, the actions of Traveler's, Metlife, Ogletree Deakins, CSL et al, highlight an elaborate fraud and corruption scheme, which have victimized untold numbers of current and former CSL employees, which only Federal Authorities can investigate and punish.

SIDENOTE - Previously, LY submitted complaints to the US Dept of Labor, FDA, FBI EEOC, Michigan Attorney General, New York Dept of Financial Services, Florida Attorney General, all to no avail.

II. Relief Sought

Since CSL receives various tax breaks, incentives, grants etc, to hire unemployed and underemployed individuals, the actions of CSL and it's various agents, constitute Fraud, False Claims etc.

As such, Relator LY seeks the involvement of the Dept of Justice and other relevant government agencies/regulators to recover lost wages, punitive and compensatory damages caused to former and current CSL employees, The United States etc.

III. Additional Information and Supporting Documents

Due to the exhaustive amount of supporting documentation, Relator LY will provide scanned PDF's to any and all parties involved in these matters (**said PDF's include Transcripts, Metlife's Administrative Records, Court Briefs, Perjury Videos & Transcripts, CSL's Standard Operating Procedures, etc**).

As such, the following items provide an overview of the allegations contained in this complaint:

- 1) Various Letters (**Implied Contracts**) from CSL Plasma to Relator LY, instructing LY to contact Manager Daniel Tasiemski (DT) **on or before 2/13/2014 and 3/19/2014**, to maintain LY's employment with CSL (**LY fulfilled these terms per item #2 below**). Said letters also instructed LY to provide Medical Documentation supporting LY's claim for Short Term Disability to Metlife, which LY did, but was wrongfully denied by Metlife, after Metlife gave LY less than two-weeks to obtain a new patient appointment with a psychiatrist, when said appointments typically take three-months or longer to obtain (**per Metlife's wrongful denial of LY's claim on 3/19/2014**).
- 2) **3/19/2014** Auto-Reply from DT's CSL email account, stating that DT would be out of the office until **3/28/2014 (in response to LY's emails and phone calls to DT on 3/19/2014)**. **2/12/2014 Transcript of Phone Call** between DT and LY on 2/12/2014. LY's phone records on 2/12/2014 and 3/19/2014, show that LY called DT at 313-305-1218 on both dates, per CSL's letters in item #1 above. **7/24/2014 Michigan Unemployment Court Ruling** in favor of LY, which states that LY called and emailed DT per CSL's specifications, but DT was unreachable on

3/19/2014. **2/11/2015 Letter from Ogletree Deakins Attorney Michael Tricarico (MT) to the EEOC**, stating numerous lies about LY and also exposing the blatant bias of Michigan State Police Detective, Larissa Lamay (LL), per the footnote on the 2nd page of said letter, stating that LL complained about LY to DT and MT during a Perjury investigation on approx 1/29/2015 (hence the reason LY was never interviewed by LL despite LY being the complainant which caused DT and CSL to be investigated by LL)

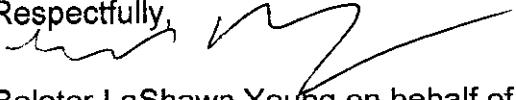
- 3) DT repeatedly and knowingly committing Felony Perjury, per his sworn testimony, that LY never contacted him (**which LY did on all required dates - 2/12/2014 & 3/19/2014**) while LY was on medical leave from 1/13/2014 to 3/21/2014 - <https://youtu.be/fDZEGtM0BEY> (**Link is Case Sensitive -- runtime approx 6-minutes --- at 2:50**, the video contains audio of a phone call between DT and LY (**on 2/12/2014**) which indisputably proves that DT knew he was lying under oath, which indisputably proves perjury. Accordingly, DT received several emails from LY during the time in question (**via DT's CSL email account**), one of which DT verified while on the call in the video (at approx 4:00).
- 4) At **18:50** in this video - <https://youtu.be/1P52C155hAg> (**link is case sensitive**) - DT, aided and abetted by MT, omitted and lied to Detective LL, regarding LY's calls and emails to DT on 2/12/2014 and 3/19/2014. Specifically, DT and MT blatantly omitted that on **3/19/2014**, DT was **OUT OF THE OFFICE AND UNAVAILABLE until 3/28/2014**, per LY's calls and emails to DT on 3/19/2014 (**see items in #2 above**). For reference, please see 2:15-cv-10080, LY's filing on **8/17/2015 (court brief and transcript from the video above)**, which detail the numerous lies of DT, MT and CSL while being investigated for Perjury by Detective LL on approx **1/29/2015**. Also, per **2:15-cv-10080**, see LY's filing on **5/19/2015 (court brief and transcripts)**, which detail DT and CSL blatantly committing perjury and omitting pertinent information during sworn testimony at Michigan Unemployment Hearings on **6/11/2014 & 7/23/2014**.
- 5) Per Case 2:15-cv-11028, see LY's filing on **7/9/2015**, which details Metlife's (**CSL's disability contractor**) malicious and anti-claimant practices, such giving LY less than two-weeks to obtain a new-patient appointment with a psychiatrist, when said appointments typically take several months to obtain (**per specific documents, contained in Metlife's Administrative Record, which were referenced in LY's 7/9/2015 filing**). Additionally, per LY's 7/9/2015 filing, Metlife's malicious practice of soliciting information from physicians, which

claimants instructed Metlife NOT to contact, is detailed (**Metlife uses said practices, to justify wrongfully denying claims**).

- 6) **Metlife settles for nearly \$500-Million Dollars for Wrongfully Denying Claims, per Death Master File Lawsuit.**
- 7) **3/9/2020** Traveler's Insurance (CSL's Workman's Comp Insurer) attempts to obtain a biased medical evaluation (in favor of CSL and Traveler's and against LY) from Dr Harvey Ager (whose highly negative online reviews indicate his anti-claimant, anti-patient bias), regarding work injuries LY sustained directly and proximately from the hostile, discriminatory, retaliatory etc, actions of CSL Plasma et al (LY's injuries include, but are not limited to anxiety, stress, heart palpitations, heart surgery, mental anguish, lost wages etc).

In closing, the actions of CSL, Metlife, Ogletree Deakins, Traveler's etc, indicate an elaborate fraud and corruption scheme, which have victimized untold numbers of current and former CSL employees, which only Federal Authorities can investigate and punish.

Respectfully,


Relator LaShawn Young on behalf of the United States

CSL Plasma
900 Broken Sound Parkway, Suite 400
Boca Raton, FL USA 33487
Tel: (561) 981-3700
Fax: (561) 312-9005
www.csplasma.com

CSL Plasma

February 5, 2014

Ref#	Date:	SHIPPING:	\$ 76
Dept:	Wgt:	SPECIAL:	0.88
	0.50 LBS	HANDLING:	0.00
		0.00	TOTAL: 10.76

MAILED FED EX AND REGULAR MAIL

BYEX: STANDARD OVERNIGHT
TRACK: 6773 6664 2763

LaShawn Young
20687 Kensington Ct
Apt 206
Southfield, MI 48076

Dear Mr. Young,

You have been absent from work since January 13, 2014. You advised your manager that you would be requesting a leave of absence and short term disability. From January 13, 2014 to present you failed to provide documentation to support your time away from work. As of January 27, 2014, your claim for short term disability has been denied by MetLife. You have not called, shown up for work and you are not out on any approved type of leave.

Our call-in procedures require:

If you will be out of the office for unscheduled occurrences in the future, you will be expected to follow proper call-in procedures. Your failure to do so may result in disciplinary action being taken.

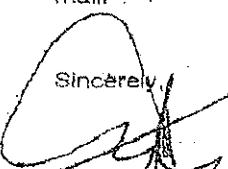
The following must occur before February 13, 2014:

- Please contact your manager (Dan Tasiemski) at 313-305-1218 between 9:00 a.m. to 5:00 p.m. to discuss your status. If you are unable to talk with your manager directly, leave a message with a number and time where you can be reached on her voice mail so that he may reach you, **AND**
- Provide MetLife, ph:877-638-8262 with medical information to certify your absence from January 13, 2014 through current, **OR**
- Return to work.

Failure to contact your manager, MetLife and/or report to work by February 13, 2014 will be considered your voluntary resignation of employment. If you do return to work by February 13, 2014, any unprotected, unapproved leave will be counted under the Attendance Policy as occurrences, and your status under the Attendance Policy will be evaluated, with possible disciplinary action.

If you have any questions, please call me. This letter is being sent to you via Federal Express delivery and regular mail.

Sincerely,


Tricia Jackson
HR Manager
(561-981-3748)

CSL Plasma
900 Broken Sound Parkway, Suite 400
Boca Raton, FL, USA 33487

RAFT Dept	Wt/ct: 296.6814 Hgt: 0.85 LBS	GHE PPTING! SPEC/Ingr. MAN/OL/INGR	9.75 3.35 6.00
0.00	0.00	TOTAL:	13.10

4/20/2014 STANDARD OVERNIGHT RES
1068/6774 66047604



CSL Plasma

February 28, 2014

MAILED FEDEX AND REGULAR MAIL

Mr. LaShawn Young
20687 Kensington Ct., Apt 206
Southfield, MI 48076

Dear Mr. Young:

MetLife notified me that your absence from 01/13/14 to present was not approved for short-term disability (STD) benefits. You are not eligible for unpaid but protected FMLA. You are currently out on an unpaid, unapproved leave of absence with no job protection.

The following is a summary regarding your absence:

- MetLife has denied your request for short-term disability.
- MetLife has not received sufficient medical information to certify your continued absence from work.
- You have not returned to work and have been placed on an unpaid leave of absence as of 01/13/14.

The following must occur on or before March 17, 2014:

- Contact your manager (Dan Tasiemski) at 313-305-1218 between 9:00 a.m. to 5:00 p.m. to discuss your status. If you are unable to speak with your manager directly, leave a message with another member of management with a number and time where you can be reached so that he may reach you, **AND**
- Provide MetLife (phone: 877-638-6262) with additional medical information to certify your absence from January 13, 2014 through current, **OR**
- If you believe that your medical condition qualifies under the ADA, complete the information per the instructions on the first page of the ADA accommodation packet included in this correspondence and return to Human Resources (address is at the top/header of this letter and on the first page of the ADA accommodation) by March 17, 2014, so that the information provided can be reviewed **OR**
- Return to work.

Failure to contact your manager, MetLife or submit a completed ADA accommodation packet/or report to work by March 17, 2014 will be considered your voluntary resignation of employment. If you do return to work by March 17, 2014, any unprotected, unapproved leave will be counted under the Attendance Policy as occurrences, and your status under the Attendance Policy will be evaluated, with possible disciplinary action.

If you have any questions, please call me. This letter is being sent to you via Federal Express delivery and regular mail.

Sincerely,

Tricia Jackson
Human Resources Manager

Enclosures

CSL Plasma
900 Broken Sound Parkway, Suite 400
Boca Raton, FL USA 33487

Tel: (561) 981-3700
Fax: (561) 981-3758
www.csplasma.com



March 03, 2014

MAILED FEDEX AND REGULAR MAIL

Mr. LaShawn Young
20687 Kensington Ct., Apt 206
Southfield, MI 48076

Dear Mr. Young:

This letter supersedes the letter dated: 02/28/14

MetLife notified me that your absence from 01/13/14 to present was not approved for short-term disability (STD) benefits. You are not eligible for unpaid but protected FMLA. You are currently out on an unpaid, unapproved leave of absence with no job protection.

The following is a summary regarding your absence:

- MetLife has denied your request for short-term disability.
- MetLife has not received sufficient medical information to certify your continued absence from work.
- You have not returned to work and have been placed on an unpaid leave of absence as of 01/13/14.

The following must occur on or before March 19, 2014:

- Contact your manager (Dan Tasiemski) at 313-305-1218 between 9:00 a.m. to 5:00 p.m. to discuss your status. If you are unable to speak with your manager directly, leave a message with another member of management with a number and time where you can be reached so that he may reach you, **AND**
- Provide MetLife (phone: 877-638-8262) with additional medical information to certify your absence from January 13, 2014 through current, **OR**
- If you believe that your medical condition qualifies under the ADA, complete the information per the instructions on the first page of the ADA accommodation packet included with this correspondence and return to Human Resources (address is at the top/header of this letter and on the first page of the ADA accommodation packet) by March 19, 2014, so that the information provided can be reviewed **OR**
- Return to work.

Failure to contact your manager, MetLife or submit a completed ADA accommodation packet/or report to work by March 19, 2014 will be considered your voluntary resignation of employment. If you do return to work by March 19, 2014, any unprotected, unapproved leave will be counted under the Attendance Policy as occurrences, and your status under the Attendance Policy will be evaluated, with possible disciplinary action.

If you have any questions, please call me. This letter is being sent to you via Federal Express delivery and regular mail.

Sincerely,

Tricia Jackson
Human Resources Manager

Enclosures

CSL Plasma
900 Broken Sound Parkway, Suite 400
Boca Raton, FL USA 33487
Tel: (561) 981-3700
Fax: (561) 912-3005
www.csplasma.com

CSL Plasma

March 18, 2014

MAILED FED EX AND VIA ELECTRONIC MAIL

Mr. LaShawn Young
20687 Kensington Ct., Apt 206
Southfield, MI 48076

Dear Mr. Young:

CSL Plasma is in receipt of your letter dated March 17, 2014. Please be advised that the findings of the investigation as detailed in the prior correspondence from CSL Plasma dated March 13, 2014, are unchanged, as is CSL Plasma's position on your request for a transfer. Regarding your work status please be reminded that the following must occur on or before March 19, 2014.

- Contact your manager (Dan Tasiemski) at 313-305-1218 between 9:00 a.m. to 5:00 p.m. to discuss your return-to-work status. If you are unable to speak with your manager directly, leave a message with another member of management with a number and time where you can be reached so that Dan may speak with you, **AND**
- Provide MetLife (phone: 877-638-8262) with additional medical information necessary to certify your absence from January 13, 2014 through current, **OR**
- If you believe that your current medical condition qualifies for an accommodation under the ADA, complete the information per the instructions on the first page of the ADA accommodation packet previously sent to you, and return the completed forms to Human Resources (address is at the top/header of this letter and on the first page of the ADA accommodation packet) by March 19, 2014, so that the information provided can be reviewed **OR**
- Return to work.

Failure to contact your manager, MetLife or submit a completed ADA accommodation packet/or report to work by March 19, 2014 will be considered by CSL Plasma as your voluntary resignation of employment. If you do return to work by March 19, 2014; please be advised that any unprotected, unapproved leave will be counted under the Attendance Policy as occurrences, and your status under the Attendance Policy will be evaluated, possibly resulting in disciplinary action.

If you have any questions, please call me. This letter is being sent to you via Federal Express delivery and via electronic mail.

Sincerely,

Tricia Jackson/MS

Tricia Jackson
Human Resources Manager

7/22/2014

Gmail - Automatic reply: CSL Plasma Letter From Tricia Jackson



To: lashawnyoung@gmail.com

Automatic reply: CSL Plasma Letter From Tricia Jackson

1 message

Daniel.Tasiemski@csplasma.com <Daniel.Tasiemski@csplasma.com>

Wed, Mar 19, 2014 at 8:25 AM

To: lashawnyoung@gmail.com

I will be out of the center until Friday, March 28th. Please contact Brittany Bennett or Desmond James for any center related issues that need immediate attention.

This email, including any attachments, is confidential and contains proprietary content and may be legally privileged. This transmission is intended only for the designated recipient(s), and any duplication or distribution, in any form or part, without the written consent of the sender is strictly prohibited. These confidentiality protections apply even if you received this transmission in error, in which case you should delete the message, disregard its contents and notify the sender of the mistake. CSL Plasma.

7/22/2014
Lashawn Young
Tricia Jackson

Transcript of Phone Call between Daniel Tasiemski and LaShawn Young

Date of Call: February 12, 2014

Transcribed by plaintiff LaShawn Young

Case #2:15-cv-10080

1) Shawn Young (SY) - Wednesday February 12, 2014. 12:15pm. I am dialing Dan Tasiemski (DT) at 313-305-1218.

2) **CSL Phone System** - Thank you for calling CSL Plasma. To speak with a member of our helpful staff, please press zero.

3) **Nicole (CSL Employee)** - Thank you for calling CSL Lincoln Park, this is Nicole speaking.

4) **SY** -Hi Nicole, can I be transferred to Dan ?

5) **Nicole** - Sure, may I ask who's calling ?

6) **SY** - Yes, this is Shawn Young.

7) **Nicole** - Oh, hey Shawn. Okay, one second.

8) **DT** - Hello this is Dan.

9) **SY** - Hey Dan, this is Shawn Young. How're you doing ?

10) **DT** - Hey what's going on ?

11) **SY** - Nothing. Just had to call in per the letter I got from Tricia Jackson, so I sent an email with the documentation she was looking for and she needed an update. She also wanted me to call you and touch base with you, so I'm doing that now.

12) **DT** - Okay. Ummmm. Let me check my...log in, look at my email. I see your email. Oh I see, Okay. Okay. Ummmm. Okay, Ummmm, I think she got this...Oh yeah she (Tricia Jackson), just sent me an email. Okay Ummmm. Ummmm, do you have a return to work date ?

13) **SY** - Not yet. Still pending some tests so, don't have that just yet. But once I get it, I'll let you guys know.

14) **DT** - Okay. Okay, thanks for calling.

15) **SY** - Alright, thanks Dan.

16) **DT** - Alright no problem. Bye.

END TRANSCRIPT - An unedited recording of this call is available for the Court's review. Plaintiff requests the Court's permission to submit the recording per Federal Rules of Evidence 608 et al, due to defendant's refusal to be truthful, defendant's blatant perjury, obstruction of justice, omissions, attempts to commit a fraud upon the Court etc



Customer Account Number
Lashawn Young

Bill Period Bill Date
Jan 23 - Feb 22 Feb 26, 2014

AB OF 5

Call details

(517) 410-6640 (Continued)

Voice Call Details

Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
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Plaintiff's call to
→ Dan Tasienski on
2/12/2018



Customer Account Number
Lashawn Young

BILL Period BILL Date
Feb 23-Mar 22 Mar 26, 2014

A4 of 5

Call details

(517) 410-6640 (Continued)

Voice Call Details

Date	Time	Phone	Cell Destination	Rate Type	Minutes	Total
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03/19 02:26 PM 313-305-1216 DETROIT, MI

All

2451

(Ass't. Mgr)

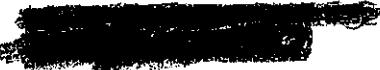
Plaintiff's call to
Dan Fasiemski on
3/19/19, since Dan
was out of the office
Plaintiff left a message
with Desmond James

Rev 04/11

STATE OF MICHIGAN
MICHIGAN ADMINISTRATIVE HEARING SYSTEM

Form 1850

DECISION

LASHAWN M YOUNG


ZLB BIOPLASMA INC
PO BOX 66744
SAINT LOUIS, MO 63166

ADMINISTRATIVE LAW JUDGE: RAYMOND SEWELL


Appeal No: 14-008531-UA

JURISDICTION

On May 1, 2014, the claimant timely appealed a May 1, 2014 Unemployment Insurance Agency (Agency) Adjudication which held the claimant disqualified for benefits under Section 29(1)(b) of the Michigan Employment Security Act (Act). Requalification by rework was also required under Section 29(3).

APPEARANCES

Hearings were held in a hearing held in Southfield, Michigan on June 11, 2014 and July 23, 2014 at which time the following participated:

Lashawn Young	Claimant (June 11 th and July 23, 2014)
Ms. Varentine	Witness for Claimant (July 23, 2014)
Tricia Jackson	Employer (June 11, 2014)
Dan Tasiemski	Employer (June 11 th and July 23, 2014)
Erica Green	Attorney for Employer (June 11 th and July 23, 2014)

FINDINGS OF FACT

The claimant stated that on February 5, 2014, he received a letter from the employer that indicated that as of January 27, 2014, his claim for short term disability had been denied by MetLife; that he had not called, shown up for work and he was not out on any approved type of leave. The claimant received another letter from the employer dated March 3, 2014 which indicated that he must contact his manager, Dan Tasiemski to discuss his employment status before March 19, 2014. The claimant stated that he

made every effort to maintain contact with the employer and MetLife with respect to his employment before March 19, 2014. The claimant indicated that when he called Mr. Tasiemski, he found out he was out of the office until March 28, 2014.

REASONING AND CONCLUSIONS OF LAW

Based on the relevant material and credible, substantial evidence taken in this appeal, the ALJ finds that the claimant separation was due to a medical reason and, is considered an involuntary separation. The ALJ made every effort to contact the MetLife but, could not make contact. The ALJ finds the doctor statement to be conclusive of the claimant's inability to return to the workplace notwithstanding the employer's leave policy and/or whether he qualified for FMLA.

ORDER

The Agency's May 1, 2014 Adjudication is modified. The Claimant is not disqualified for benefits under Section 29(1)(a) of the Act.

Requalification by rework is not required under Section 29(3).

The claimant is entitled to benefits for each claimed week following the filing for benefits, if otherwise eligible and qualified.

Decision Date: July 24, 2014


RAYMOND SEWELL
ADMINISTRATIVE LAW JUDGE

LaShawn Young v.CSL Plasma Inc.
 EEOC Charge No.: 471-2014-02854
 February 11, 2015
 Page 2

CSL's Commitment to a Discrimination-Free Work Environment

At all times during Young's employment with CSL, CSL maintained and enforced strict policies against discrimination, harassment and retaliation in the workplace. These policies included a strict prohibition against workplace discrimination based on race, gender, and retaliation for engaging in protected conduct.

CSL's anti-discrimination policies contain a complaint procedure whereby any CSL employee who believes that he/she was the victim of harassment, retaliation or discrimination can make a formal complaint to the Company. In addition to the ability to make a written or verbal complaint to a manager or Human Resources, CSL also provides two toll-free phone numbers for employees to report harassment, retaliation or discrimination of any kind; one of which is a "hotline" number whereby employees would be provided additional access to Human Resources personnel and services.

These policies and the complaint procedure are included in the CSL Employee Handbook, which is distributed to all CSL employees at the commencement of their employment. (**Exhibit A**)

Preliminary Statement

Young's Charge is meritless and contains fabricated allegations all in furtherance of a bizarre continuing vendetta Young has embarked on against CSL and of one of its employees. To date, Young has filed a bogus complaint against CSL with the Michigan Occupational Safety & Health Administration ("MIOSHA"), which was summarily dismissed as meritless (**Exhibit B**); made a complaint to the plasma collection industry regulatory body, which was rejected; complained to the Food and Drug Administration ("FDA"), which complaint was rejected; sued CSL and his former Center Manager, Daniel Tasiemski ("Tasiemski") for defamation and retaliation for whistleblowing (**Exhibit C**); tried to have Tasiemski prosecuted by the State of Michigan for allegedly lying during Young's unemployment compensation hearing (also false);¹ filed a Bar Complaint against the undersigned, which was also summarily thrown-out (**Exhibit D**); and posted a defamatory rant on YouTube against Tasiemski. (**Exhibit E**)

As the below and attached exhibits will show, Young has a misguided and almost delusional sense of his skills and "importance" to CSL. Even after being admonished multiple times and being placed on a Final Written Warning, Young was writing to corporate Human Resources suggesting that the Company should be "grooming" him for a "corporate level position."

As far as his Charge is concerned, contrary to his fabricated claims, Young was terminated by CSL after he abandoned his job. Young, after being placed on a Final Written Warning for multiple performance deficiencies and behavioral issues, immediately stopped coming to work, claiming that his doctor had instructed him to remain out of work for some unknown medical condition. Young applied for Short-Term disability, which application was rejected by CSL's third-party disability vendor, MetLife, because the documentation supplied by Young was not adequate to support an

¹ Note that Michigan State Police Detective Sargent LaMay, who is investigating Young's "perjury" complaint against Tasiemski, has informed us that Young is already and regularly calling her supervisor at the Michigan State Police and complaining about her.

03/19/2020 10:45 AM (PDT) Case 2:20-cv-10738-PDB-EAS Document 1 Filed 03/19/20 Page 25 of 30

Case 2:20-cv-10738-PDB-EAS Document 1 Filed 03/19/20 Page 25 of 30 Page ID: 00025

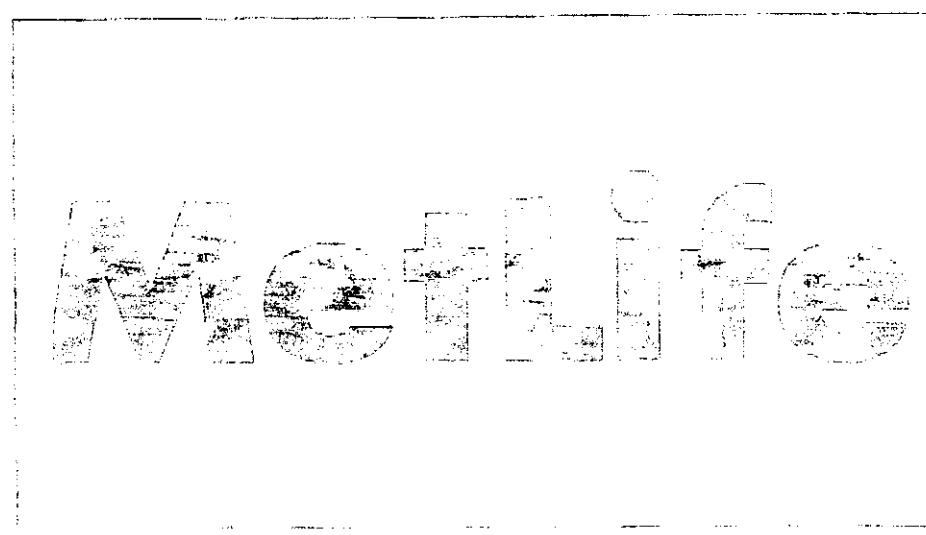
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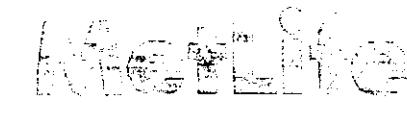
Case 2:20-cv-10738-PDB-EAS Document 1 Filed 03/19/20 Page 25 of 30 Page ID: 00025

MediLife, 24 states reach settlement for \$500 million



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LOS ANGELES — MediLife Inc. (MediLife) will pay nearly \$500 million in settlements involving more than 30 states that claimed it didn't provide life insurance benefits to some of its policyholders, the companies said Tuesday.

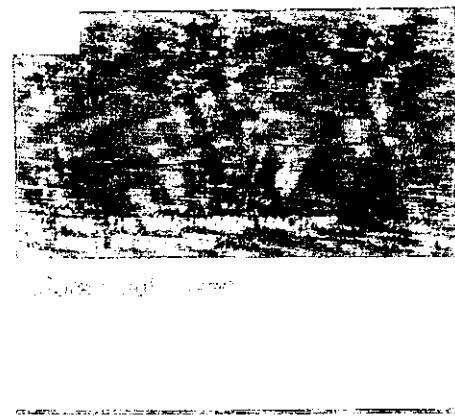
The largest life insurer in the United States said it expects to pay about \$300 million of the \$478 million this year, and the remainder for over the next 17 years.

State regulators investigated MediLife's use of the Social Security Administration's "Death Master" file, a database of people who have died.

California Comptroller John Chiang said a joint investigative hearing held last year revealed MediLife had information about the deaths of some of its life insurance policyholders but failed to pay what was owed.

"These settlements make it clear that if the industry isn't willing to make the payments legally required, we will take action, including lawsuits, to compel them to do right by their customers," Chiang said.

Case 2:20-cv-10738-PDB-EAS Document 1 Filed 03/19/20 Page 25 of 30 Page ID: 00025

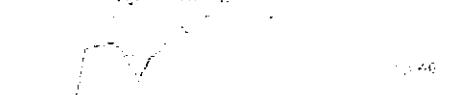


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Market Watch

Case 2:20-cv-10738-PDB-EAS Document 1 Filed 03/19/20 Page 25 of 30 Page ID: 00025

Market Watch

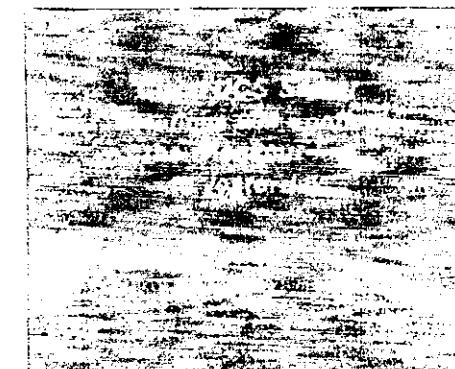


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Case 2:20-cv-10738-PDB-EAS Document 1 Filed 03/19/20 Page 25 of 30 Page ID: 00025

1997	1998	1999	2000
MediLife	East Chicago	West Chicago	
\$7.8M	\$11.4M	\$12.5M	\$10.5M
NAIC	4,200,000	4,275,000	4,033,000
SIW 200	2,227,000	2,712,000	2,032,000



AP/FILE

MetLife maintains it paid more than 80 percent of life insurance benefits and it has been working with regulators to ensure everyone is paid.

Many long-term care insurance may be paid out in reduced premiums & benefits for alleged fraudulence abuses.
MetLife's practice is to pass out death benefits on time.

"The company has been working with regulators to develop industry best practices and is pleased to announce new processes that will provide an even stronger safety net for the limited number of beneficiaries who do not submit a claim to the company in the normal course of business," the company said in a statement.

MetLife has undertaken a variety of steps to locate policyholders who have lost contact with the company, including implementing a monthly tracking process. The company also has created a website to aid customers by filing a profile.

Californians' share from the agreement, which was reached last week, is expected to be about \$20 million. It's not immediately known how much the other 38 states will receive.

Among those included in the settlement are Florida, Illinois, North Carolina and Pennsylvania.

Other companies included in the settlement with insurer John Hancock (MFC) and Prudential Insurance (PIN) last year paid to the state of California.

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Global News



3/9/2020

LASHAWN YOUNG
 20687 KENSINGTON CT
 206
 SOUTHFIELD, MI 48076

EMPLOYER/INSURED: CSL BEHRING LLC
 CLAIM NUMBER: FMK7006
 DATE OF INJURY: 01/10/2014
 APPOINTMENT DATE: 03/23/2020 at 09:30 am; This appointment can last up to 4-6 hours. Please plan accordingly.

An appointment has been scheduled for you at the request of FRANCINE MAYES of TRAVELERS (WC)/INDIANAPOLIS. Your evaluation is on Monday, March 23, 2020 at 9:30 am. The evaluation will take place at 29355 NORTHWESTERN HIGHWAY, SUITE 140 SOUTHFIELD, MI 48034.

DATE AND TIME OF EVALUATION:

This evaluation has been scheduled for Monday, March 23, 2020 at 9:30 am. Please be prepared to present photo ID at the time of your appointment.

LOCATION OF EVALUATION:

The evaluation will take place at 29355 NORTHWESTERN HIGHWAY SUITE 140, SOUTHFIELD, MI 48034. For verbal directions please call (248) 356-8050.

INDEPENDENT EXAMINER:

HARVEY AGER, M.D., Specialty: Psychiatry, will perform the evaluation. The examiner is an independent evaluator. After the evaluation is completed, the examiner will provide a written report to the party that scheduled your evaluation. That report will contain the examiner's opinion regarding your condition.

RECORDS AND REPORTS:

Please bring films including any MRI, X-Rays or CAT scans. The examiner will need these records in order to make a complete evaluation of your condition. There will be forms to fill out, please plan accordingly or if forms are attached please complete and bring to your appointment.

PLEASE ARRIVE ON TIME OR YOU WILL NOT BE SEEN

**IF YOU ARE A MINOR YOU MUST BE ACCCOMPANIED BY A PARENT OR LEGAL GUARDIAN
 PLEASE CALL TO CONFIRM YOUR APPOINTMENT UPON RECEIPT OF THIS LETTER AT (866) 637-7575.**

Sincerely
 Ayania C

CC:

FRANCINE MAYES at TRAVELERS (WC)/INDIANAPOLIS

LASHAWN YOUNG
 20687 KENSINGTON CT
 206
 SOUTHFIELD, MI 48076

harvey ager


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Dr. Harvey G Ager MD Reviews | Detroit, MI | Vitals.com

Harvey G Ager, MD is a doctor primarily located in Detroit, MI, with another office in Southfield, MI. Their specialties include Psychiatry. Rating Overview: 19 ...

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Harvey Ager, MD. Harvey Ager, MD. 29355 Northwestern Hwy Ste 140 Southfield, MI 48034.

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Dr. Harvey Ager, Psychiatrist in Southfield, MI | US News Doctors

Dr. Harvey Ager is a psychiatrist in Southfield, Michigan and is affiliated with DMC Harper University Hospital. He received his medical degree from Wayne State ...

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Dr. Harvey Ager, MD is a board certified psychiatrist in Southfield, Michigan. He is affiliated with DMC Harper University Hospital.

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Dr. Harvey Gerald Ager Psychiatrist Southfield, MI MedicineNet

Ager works in Detroit, MI and 1 other location and specializes in Psychiatry. Dr. Ager is affiliated with Harper University Hospital. Gender: N/A. Years in Practice: N/ ...



Ager Harvey MD

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JS 44 (Rev. 02/19)

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I. (a) PLAINTIFFS <i>United States Relator LaShaun Young</i> (b) County of Residence of First Listed Plaintiff <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i> (c) Attorneys (Firm Name, Address, and Telephone Number) <i>N/A LaShaun Young 206-87 Kensington Court Apt 206 Southfield, MI 48076</i>		DEFENDANTS <i>CSL Plasma et al. 700 Broken Sound Pkwy, Suite 400 Boca Raton, FL 33487 Palm Beach</i> County of Residence of First Listed Defendant <i>(IN U.S. PLAINTIFF CASES ONLY)</i> NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (if Known)																																										
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Medical Malpractice </td> <td> PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability </td> <td> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other </td> <td> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 </td> <td> <input type="checkbox"/> 375 False Claims Act <input checked="" type="checkbox"/> 376 Qui Tam (31 USC 3729d) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 495 Securities/Commodities Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes </td> </tr> <tr> <td>REAL PROPERTY</td> <td>CIVIL RIGHTS</td> <td>PRISONER PETITIONS</td> <td>LABOR</td> <td>SOCIAL SECURITY</td> </tr> <tr> <td> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property </td> <td> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer w/Disabilities - 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VI. CAUSE OF ACTION <i>Qui Tam 31 USC 3729 et seq</i> Brief description of cause: <i>CSL et al, are engaging in Fraud, Corruption etc</i>																																												
VII. REQUESTED IN COMPLAINT: <input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.		DEMANDS <i>Exceeds \$75,000</i>		CHECK YES only if demanded in complaint: <input type="checkbox"/> Yes <input type="checkbox"/> No JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																								
VIII. RELATED CASE(S) IF ANY <i>(See instructions)</i>		JUDGE <i>Marianne Battani</i>		DOCKET NUMBER <i>2:15-cv-11028</i>																																								
DATE	SIGNATURE OF ATTORNEY OF RECORD																																											

FOR OFFICE USE ONLY

RECEIPT #	AMOUNT	APPLYING IPP	JUDGE	MAG. JUDGE
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PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

If yes, give the following information:

Court: US District Court Eastern District of Michigan

Case No.: 2:15-cv-10080 and 2:15-cv-11028

Judge: Denise Page Hood and Marianne Battani

Michigan Worker's Compensation Court - Young v CSL - Judge Michael Heck

Notes: _____
